

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Francisco DOMINGUEZ-Bermudez, YOB: 1958, MEX

Case No.

7:21-MJ-0387-4

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01-2016 thru 03-25-2021 in the county of Hidalgo and Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 U.S.C. 1956(h)

The defendant did conspire knowing, property involved in a financial transaction represents the proceeds of some form of unlawful activity (SUA), conducts/attempts a financial transaction designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of SUA or to avoid a transaction reporting requirement.

This criminal complaint is based on these facts:

See Attachment "A".

☒ Continued on the attached sheet.

Complaint Authorized by AUSA P. Profit.



Complainant's signature

Mariah Yates, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

3/25/2021

City and state:

McAllen, Texas



Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

Attachment "A" my

From at least in or about 2016 through on or about March 25 2021, in the Southern District of Texas and elsewhere, Francisco DOMINGUEZ-Bermudez, hereinafter DOMINGUEZ, the defendant, and others known and unknown, unlawfully, willfully and knowingly, combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Section 1956(h) of Title 18, United States Code.

It was a part and an object of the conspiracy that DOMINGUEZ, the defendant, and others known and unknown, conspired knowing, property involved in a financial transaction represents the proceeds of some form of unlawful activity (SUA), narcotic trafficking, conducts/attempts a financial transaction designed to conceal or disguise the nature, location, source, ownership, or control of the proceeds of SUA or to avoid a transaction reporting requirement, in violation of Section 1956(h) of Title 18, United States Code.

Among the means and methods by which DOMINGUEZ, the defendant, and his co-conspirators would and did carry out the conspiracy were the following:

- a. At all times relevant to this ~~Indictment~~ ^{complaint my}, DOMINGUEZ claimed he was a sales representative of STBS, which is a beauty supply store with its main store and office in McAllen, Texas, and two other locations in Laredo and Harlingen, Texas.
- b. At all times relevant to this ~~Indictment~~ ^{complaint my}, DOMINGUEZ and his co-conspirators imported bulk quantities of currency, primarily large denomination of United States Currency, into the United States from Guadalajara, Mexico. The total value of the currencies imported by DOMINGUEZ was equivalent to more than \$2,795,000 in U.S. dollars. More than \$2,415,000 in U.S. dollars were deposited by DOMINGUEZ into STBS International Bank of Commerce (IBC) account number 5554096701, and the remainder of the imported U.S. dollars was deposited into his own bank account, located at Wells Fargo, and other businesses. DOMINGUEZ would contact the main store in McAllen, Texas, in order to confirm the deposits of currency into the bank account. On February 23, 2021, pursuant to a seizure warrant, IBC account number 5554096701 was seized to undergo forfeiture for involvement in money laundering conspiracy.
- c. At all times relevant to this ~~Indictment~~ ^{complaint my}, DOMINGUEZ and his co-conspirators coordinated the transportation of large quantities of money orders, from other states, to include Michigan and Ohio. The total value of the money orders coordinated by DOMINGUEZ was equivalent to more than \$219,000, deposited into STBS International Bank of Commerce account number 5554096701. DEA Agents have found that the individuals sending the money orders, on behalf of DOMINGUEZ, from Michigan and Ohio are involved in drug trafficking investigations.